



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 22 2016

**CERTIFIED MAIL 7009 1680 0000 7669 1932**  
**RETURN RECEIPT REQUESTED**

Ms. Rebecca Marchand  
Environmental, Health and Safety Manager  
Dixline Corporation  
26 SW 4<sup>th</sup> Avenue  
Post Office Box 166  
Galva, Illinois 61434

Re: Notice of Violation  
Compliance Evaluation Inspection  
ILD 005 267 810

Dear Ms. Marchand:

On August 7, 2015 a representative of the U.S. Environmental Protection Agency inspected the Dixline Corporation (Dixline) located in Galva, Illinois. As a large quantity generator of hazardous waste, Dixline is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Dixline's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Dixline, EPA's review of records pertaining to Dixline, and the inspector's observations, EPA has determined that Dixline has unlawfully stored hazardous waste without a permit or interim status as a result of Dixline's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Dixline was out of compliance at the time of the inspection in paragraphs 1-2, below.

At the time of the inspection, Dixline was out of compliance with the following large quantity generator permit exemption condition:

**STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS**

1. Date When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, the Dixline was accumulating two containers of hazardous waste without the accumulation start date.

## 2. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, Dixline was accumulating one container of hazardous waste without the words "Hazardous Waste."

Under Ill. Admin. Code tit. 35 § 722.134(C)(1)(ii) [40 C.F.R. § 262.34(C)(1)(ii)], a large quantity generator who accumulates up to 55-gallon of hazardous waste in containers at or near the point of generation must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste" or with words that identify the contents of the containers.

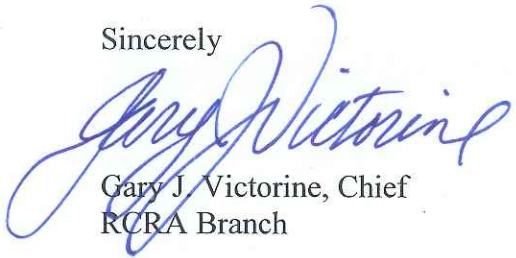
At the time of the inspection, Dixline was accumulating one satellite container of hazardous waste in the Buffing Department with the words "Non-Hazardous Waste" instead of "Hazardous Waste."

At this time, EPA is not requiring Dixline to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-2, above.

During the inspection, as observed by EPA, and after the inspection, as documented in your August 7, 2015 emails to EPA, you took certain actions to establish compliance with the permit exemption conditions in paragraphs 1-2, above. Based on the information received from Dixline on August 7, 2015, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Dixline's cooperation.

If you have any questions regarding this letter, please contact Ms. Graciela Scambiaterra, of my staff, at 312-353-5103 or at [scambiaterra.graciela@epa.gov](mailto:scambiaterra.graciela@epa.gov).

Sincerely



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

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cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
LAND AND CHEMICALS DIVISION, RCRA BRANCH  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Dixline Corporation

EPA ID No.: ILD 005 267 810

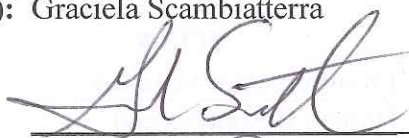
LOCATION ADDRESS: 26 SW 4<sup>th</sup> Ave  
P.O. Box 166  
Galva, Illinois 61434

NAICS CODE(s): 33251 [Hardware Manufacturing]

DATE OF INSPECTION: August 7, 2015

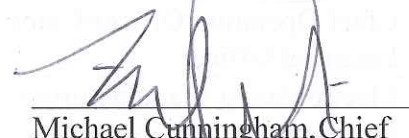
U.S. EPA INSPECTOR(s): Graciela Scambiatterra

PREPARED BY:

  
Graciela Scambiatterra  
Environmental Scientist

1/14/2016  
Date

APPROVED BY:

  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

2/1/2016  
Date

## **RCRA Compliance Evaluation Inspection**

### **Introduction**

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Dixline Corporation (Dixline), located at 26 SW 4<sup>th</sup> Ave, Galva, Illinois. The Purpose of the CEI was to evaluate Dixline's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

Photographs (photos) taken during the inspection are included in Attachment 1.

### **History and Interview**

I arrived at Dixline on August 7, 2015 at approximately 8:15 a.m., identified myself and provided my credentials to Rebecca Marchand, Human Resources and Environmental Health and Safety Manager. She escorted me to the office area where I conducted the opening interview. The following individuals were present during the CEI:

<b>NAME</b>	<b>TITLE</b>	<b>EMPLOYER</b>
Gracie Scambiaterra	Environmental Scientist	U.S. EPA
Rebecca Marchand	Human Resources and Environmental Health and Safety Manager	Dixline
David Fenton	Chief Operating Officer/Chief Financial Officer	Dixline
Scott Hillan	Electroplating Manufacturing Manager	Dixline

Once we were in the office area, I held an opening conference with the individuals listed above. I explained to them the purpose for being at the facility; and that I would be performing a records review and a physical site inspection of the facility, including taking photographs. Our discussion included confidential business information (CBI). I informed the Dixline representatives that if they or any other Dixline employees were going to disclose CBI, I should be informed immediately in order for me to handle that material and/or information in accordance with EPA policy.

Mr. Fenton provided a brief history of the facility. Dixline has been operating at this location since approximately 1924. Dixline is a decorative finishing company conducting dry and wet plating for consumer, commercial or industrial needs. Their core business is decorative hardware for burial caskets, but recently added additional manufacturing, including window hardware. They have approximately 95 employees at this location and operate Monday through Friday, 24 hours per day.

According to the RCRAInfo database, Dixline submitted a biennial report, on or about March 1, 2014, for its 2013 calendar year generator activities and notified that it was operating as a large quantity generator of hazardous waste.

I provided the Small Business Resources Guide to Mr. Fenton.

I explained to the Dixline representatives that I would be conducting the records review portion first, followed by the physical site inspection.

### Records Review

#### Training

I asked to see the RCRA training records for years 2012, 2013 and 2014 for facility personnel who are involved in hazardous waste management duties. Ms. Marchand provided me the following for my review:

❖ 2014:

➤ "RCRA Training:"

- Trainer: Scientific Control Laboratories, Inc.
- Date: 8/22/2014
- Six Dixline employees trained
- Topics covered:
  - Chemical Safety Contingency Plan
  - Evacuation and Emergency Procedures
  - Annual Assignment of Responsibilities

❖ 2013:

➤ "Hazardous Waste Training:"

- Trainer: Scientific Control Laboratories, Inc.
- Date: 6/7/2013
- Seven Dixline employees trained
- Topics covered:
  - Chemical Safety Contingency Plan
  - Evacuation and Emergency Procedures
  - Annual Assignment of Responsibilities

❖ 2012:

➤ "RCRA Training/DOT Refresher:"

- Trainer: Scientific Control Laboratories, Inc.
- Date: 11/1/2012
- Six Dixline employees trained
- Topics covered:
  - Chemical Safety Contingency Plan
  - General Awareness/Familiarization and Function

### Contingency Plan

I asked to see Dixline's hazardous waste contingency plan. Ms. Marchand provided me the following for my review:

- ❖ The plan titled "Chemical Safety Contingency Plan for Dixline Corporation."
  - Revised 8/27/2014
  - Emergency Coordinators:
    - Scott Hillan
    - Rebecca Marchand
  - Arrangements made with the following emergency departments:
    - Galva Fire Department
    - Galva Police Department
    - Galva Ambulance Service
  - Emergency Response Equipment
  - Evacuation Plan and map with Evacuation Routes

I asked the Dixline representatives if they had sent the plan to the emergency departments and if so, did they have documentation of the submittals. They replied that they had sent them, but they didn't have any documentation of the submittal.

### Annual Reports

I reviewed the Hazardous Waste Annual Report for the following years:

Hazardous Waste Annual Report			
Calendar Year:	2014	Date Signed:	2/13/2015

Hazardous Waste Annual Report			
Calendar Year:	2013	Date Signed:	2/14/2014

Hazardous Waste Annual Report			
Calendar Year:	2012	Date Signed:	2/22/2013

### Manifests/LDRs

Ms. Marchand provided me the hazardous waste manifest for year 2013 until the present, for my review. The most recent hazardous waste manifest are listed below:

Hazardous Waste Manifests				
Manifest Number	Waste Code(s)	Quantity	Date	TSDf Signature?
008955163 FLE	F005/F003/D001/D035	1,800 lbs	7/21/2015	NA
008239009 FLE	F005/F003/D001/D035	1,150 lbs	3/16/2015	Yes



013432808 JJK	F008/D002/F006/D003	Several lbs	2/19/2015	Yes
008237538 FLE	F005/F003/D001/D035	3,200 lbs	1/20/2015	Yes

Treatment, Storage and Disposal Facilities (TSDFs) where above waste was sent to:  
EPA I.D. #WID 990 829 475.

#### Hazardous Waste Determinations

Ms. Marchand provided me the hazardous waste determinations for their Oil/Oil Dry/Oil Soiled Cardboard and the UV Clear Coat waste which are both sent offsite as non-hazardous waste. The Oil Dry waste determination was dated 11/10/2004 and I reviewed the most recent Material Safety Data Sheet for the UV Clear Coat.

#### Inspection Reports

Ms. Marchand provided the weekly inspection records for Dixline's less than 90-day hazardous waste storage area. I reviewed the weekly inspection sheets for years 2013 until the present.

I concluded the records review and prepared for the physical site inspection. Mr. Hillan escorted me during the site inspection.

#### Site Inspection

The Dixline site inspection began at approximately 10:25 a.m. in the Plating Line. The plating line consisted of several processing baths, including: nickel, trivalent chrome, cyanide, copper, acid copper, zinc sulfate, sulfuric acid, hydrochloric acid, and several rinse water baths. Two hazardous waste satellite containers of acid-based debris and cyanide-based debris were being accumulated here (*see photo 1*).

The next area we inspected was the onsite Wastewater Treatment System (WWTS) Area. Hazardous waste sludge (F006) is generated and stored here. I observed two F006 yard bags in this area (*see photos 2-3*). Neither of the F006 yard bags contained an accumulation start date, nor was the yard bag in photo 3 labeled with the words "Hazardous Waste." Nearby were additional containers of hazardous waste, including four debris containers (*see photo 4*) and one cyanide carbonate container (*see photo 5*). All these containers had the accumulation start dates and were labeled with the words "Hazardous Waste." In the area there was also a container of non-hazardous UV Clear Coat waste (*see photo 6*).

We then walked to the Buffing Department. Casts, formed in the Die Cast Building, are brought here and buffed for prepping before being plated. There was a satellite container of hazardous UV liquid in this area (*see photo 7*). The container was labeled with a non-hazardous waste label and I pointed this out to Mr. Hillan. The buffing department is also where parts are coated with paint and thinner is used to clean the painting equipment.

The final areas we inspected were the Vacuum Metal Area and the Die Casting Building. In the Vacuum Metal Area, base coating operations on metal and plastic occur. Top coating is accomplished with a solvent-based coating. There was a container of hazardous waste coatings in this area (*see* photo 8). The Die Cast Building is where zinc ingots are melted and then formed into casts. I did not observe any hazardous waste in the Die Casting Building.

I concluded the Dixline physical site inspection at approximately 11:30 a.m., at which time Mr. Hillan escorted me back to the office area so I could conduct a closing conference.

### **Closing Conference**

Once we returned to the office area, I sat down with Ms. Marchand, Mr. Fenton and Mr. Hillan to discuss the records review and the site inspection. The following topics were discussed:

1. Contingency Plan: we discussed the submittals of the plan to the emergency departments. They informed me that they would re-send them and send me the documentation of the submittals via email.
2. Container Issues: we discussed the labeling issues for the three containers (two F006 yard bags in the WWTS Area and one container in the Buffing Department). I was informed the container issues would be corrected immediately and they would send me documentation via email.

I thanked the Dixline representatives for their time and I explained that a thorough review would be completed and a compliance determination would be forthcoming.

I completed the CEI at approximately 12:30 p.m. and departed the facility.

### **ATTACHMENTS: (2)**

Attachment 1	Photographs taken during the inspection
Attachment 2	Inspection checklist

### **ADDENDUM:**

On 8/7/2015, I received email correspondence correcting the labeling issues for the three containers. In addition, I received documentation that the contingency plan was sent to the emergency departments listed in the plan.

## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810  
8/7/2015



Photo 1. Photographer: G. Scambiatterra. Time: 10:39 a.m.  
Description: Plating line satellite containers. Left container has acid-based debris. Right container has Cyanide-based debris.

## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810

8/7/2015



Photo 2. Photographer: G. Scambiatterra. Time: 10:48 a.m.  
Description: F006 yard bag. No accumulation start date.



## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810  
8/7/2015



Photo 3. Photographer: G. Scambiaterra. Time: 10:53 a.m.

Description: F006 yard bag. No accumulation start date. No "Hazardous Waste" label or markings.

## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810

8/7/2015



Photo 4. Photographer: G. Scambiaterra. Time: 10:55 a.m.  
Description: Acid and cyanide debris containers in storage.

## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810  
8/7/2015



Photo 5. Photographer: G. Scambiaterra. Time: 10:55 a.m.  
Description: Cyanide carbonate waste in storage.



# Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810

8/7/2015



Photo 6. Photographer: G. Scambiatterra. Time: 11:04 a.m.  
Description: UV Clear Coat waste, non-hazardous.



## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810

8/7/2015



Photo 7. Photographer: G. Scambiaterra. Time: 11:08 a.m.

Description: UV liquid waste, hazardous waste. Buffing Department. Labeled with a non-hazardous label.

## Attachment 1

Dixline Corporation- EPA ID Number: ILD 005 267 810

8/7/2015



Photo 8. Photographer: G. Scambiaterra. Time: 11:20 a.m.  
Description: Coating waste, hazardous waste. Vacuum Metal Area.

Installation Name:  
Dixline Corporation  
Date of Inspection:  
August 7, 2015

Location Address:  
26 SW 4<sup>th</sup> Ave  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 005 267 810

## Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.121(a)	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)



Installation Name:  
Dixline Corporation  
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August 7, 2015

Location Address:  
26 SW 4<sup>th</sup> Ave  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 005 267 810

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.123(c)
722.130	<p><b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b></p> <p>Is there any hazardous waste ready for transport off-site? <input checked="" type="checkbox"/></p> <p>Yes _____ No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	722.130
(722.134(a))	<p><b>Section 722.134 Accumulation Time</b></p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers? <input checked="" type="checkbox"/></p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
(725.211) (725.214)	<p><b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b></p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? <input checked="" type="checkbox"/></p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.211 725.214

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26 SW 4<sup>th</sup> Ave  
**U.S. EPA Inspector:**  
Graciela Scambiatterra

**EPA ID Number:**  
ILD 005 267 810

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>✓</u>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <u>✓</u> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <u>✓</u> No _____ N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No _____ N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <u>✓</u> No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <u>✓</u> No _____ N/A _____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <u>✓</u> No _____ N/A _____ <b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes _____ No _____ N/A <u>✓</u> COMMENTS:	
(725.278)	<b>Section 725.278 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <u>✓</u> Comments: Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No _____ N/A <u>✓</u> <b>Note:</b> If "No", go to Subpart C.	
(725.211) (725.214)	<b>SUBPART J: TANK SYSTEMS</b> Has the generator closed an accumulation area? Yes _____ No _____ N/A <u>✓</u> If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>✓</u>	725.211
		725.214

Installation Name:  
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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.  If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.  b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).  c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]?  Yes _____ No _____ N/A <u>✓</u></p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment?  Yes _____ No _____ N/A <u>✓</u></p> <p>2) hazardous characteristics of the wastes?  Yes _____ No _____ N/A <u>✓</u></p> <p>3) existing corrosion protection measures?  Yes _____ No _____ N/A <u>✓</u></p> <p>4) documented age of the tank system?  Yes _____ No _____ N/A <u>✓</u></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination?  Yes _____ No _____ N/A <u>✓</u></p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste?  Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

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(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A <u>✓</u></p> <p>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A <u>✓</u></p>	
	<p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A <u>✓</u></p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A <u>✓</u></p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A <u>✓</u></p>	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A <u>✓</u></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A <u>✓</u></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A <u>✓</u></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A <u>✓</u></p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A <u>✓</u></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A <u>✓</u></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A <u>✓</u></p>	

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(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A <u>✓</u></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A <u>✓</u></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A <u>✓</u></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A <u>✓</u></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A <u>✓</u></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A <u>✓</u></p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A <u>✓</u></p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A <u>✓</u></p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A <u>✓</u></p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A <u>✓</u></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A <u>✓</u></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	



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(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A <u>✓</u>	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A <u>✓</u> 2) overfill prevention controls? Yes _____ No _____ N/A <u>✓</u> 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A <u>✓</u>	
(725.294(c))	<b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes _____ No _____ N/A <u>✓</u> 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A <u>✓</u> 3) data from monitoring equipment? Yes _____ No _____ N/A <u>✓</u> 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A <u>✓</u>	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A <u>✓</u>	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <u>✓</u> b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <u>✓</u> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <u>✓</u>	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <u>✓</u> d3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <u>✓</u> <b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

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(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A <u>✓</u></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A <u>✓</u></p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <u>✓</u></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> <li>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A <u>✓</u></li> <li>- Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>✓</u></li> </ul> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A <u>✓</u></p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A <u>✓</u></p>	

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(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A <u>✓</u>	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A <u>✓</u>  If "No", skip to Section 725.300.	
	Is Section 725.117(b) being complied with? Yes _____ No _____ N/A <u>✓</u>  Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A <u>✓</u>  COMMENTS:	
(725.302)	<b>Section 725.302 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <u>✓</u>  Comments:	
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b>  Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <u>✓</u> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <u>✓</u> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <u>✓</u> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <u>✓</u> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <u>✓</u> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <u>✓</u> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <u>✓</u> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <u>✓</u> No _____ N/A _____	

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(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>- arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.151(a))	<p><b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b></p> <p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> <li>- fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	

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(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <u>✓</u> No _____ N/A _____</p> <p>b) submitted to:</p> <p>- police department? Yes <u>✓</u> No _____ N/A _____</p> <p>- fire department? Yes <u>✓</u> No _____ N/A _____</p> <p>- hospital? Yes <u>✓</u> No _____ N/A _____</p> <p>- emergency response teams? Yes <u>✓</u> No _____ N/A _____</p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <u>✓</u> No _____ N/A _____</p> <p>b) the plan fails in an emergency? Yes <u>✓</u> No _____ N/A _____</p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <u>✓</u> No _____ N/A _____</p> <p>d) information regarding emergency coordinators changes? Yes <u>✓</u> No _____ N/A _____</p> <p>e) information regarding equipment changes? Yes <u>✓</u> No _____ N/A _____</p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <u>✓</u> No _____ N/A _____</p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <u>✓</u> No _____ N/A _____</p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <u>✓</u> No _____ N/A _____</p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <u>✓</u> No _____ N/A <u>✓</u></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	

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(725.116(a))	<p><b>Section 725.116 Personnel Training</b> Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

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Dixline Corporation  
Date of Inspection:  
August 7, 2015

Location Address:  
26 SW 4<sup>th</sup> Ave  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 005 267 810

## Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
722.134(c)	<p><b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(g)	<p><b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	<p><b>SUBPART D: RECORDKEEPING AND REPORTING</b></p>	
722.140(a)	<p><b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes _____ No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes _____ No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)

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**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(b)
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170